

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
INNOVATION VENTURES, LLC, LIVING
ESSENTIALS, LLC, and INTERNATIONAL
IP HOLDINGS, LLC.,

TOP CHOICE TRADING USA, INC.
ANSWER TO SEVENTH AMENDED
COMPLAINT

Plaintiffs,

-against-

12 Civ. 5354 (KAM)

ULTIMATE ONE DISTRIBUTING CORP.,
ET AL.,

Defendants.

-----X
Defendant, TOP CHOICE TRADING USA, INC, by and through its attorney, LESLIE
NIZIN, ESQ., as and for an Answer to the Seventh Amended Complaint, superficially allege and
state as follows:

1. Deny having knowledge and information sufficient to form a belief as the allegations
set forth in the First and Second Cross Clams filed by te defendants Shah Distributors, Inc. or
Arvind Shah as set forth in paragraphs "32", "33", "34", and "35" of their cross claim.

**AS AND FOR A FIRST CROSS-CLAIM AGAINST DEFENDANT
STEERFORTH TRADING, INC. a/k/a STEER FORTH TRADING, INC.
FOR INDEMNIFICATION**

2. Defendant, TOP CHOICE TRADING USA, INC., repeates, reiterates and realleges
each and every response set forth in paragraphs "1" to "65 " as if more fully set forth herein.

3. If defendant, TOP CHOICE TRADING USA, INC., should be found liable to Plaintiff
on any cause of action in the Complaint, then the Defendants claim indemnification from the
Defendant, STEERFORTH TRADING INC., a/k/a STEER FORTH TRADING, INC., for any
such liability.

**AS AND FOR A SECOND CAUSE OF CROSS-CLAIM AGAINST
DEFENDANT STEERFORTH TRADING, INC., a/k/a STEER FORTH
TRADING, INC. FOR CONTRIBUTION**

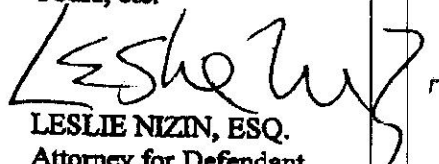
4. Defendant, TOP CHOICE TRADING USA, INC., repeats, reiterates and realleges each and every response set forth in paragraphs "1" through "3" as if more fully set forth at length herein.

5. If Defendant, SHAH DISTRIBUTORS INC. Or ARVIND SHAH, should be found to be liable to Plaintiff on any of the Causes of Action in the complaint, then Defendants claim contribution from Defendant, STEERFORTH TRADING, INC., a/k/a STEER FORTH TRADING, INC., for any such liability.

WHEREFORE, Defendant, TOP CHOICE TRADING USA, INC., demands that the Complaint be dismissed in its entirety; judgment on the cross-claims, and for such other and further relief as to this Court may deem just and proper.

Dated: Kew Gardens, New York
February 25, 2014

Yours, etc.


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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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INNOVATION VENTURES, LLC, et al.,

Plaintiffs,

12 Civ. 5354 (KAM-RLM)

- against -

ULTIMATE ONE DISTRIBUTING CORP.,
et al.,

Defendants.
-----X

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing TOP CHOICE TRADING
USA, INC. ANSWER TO THE SEVENTH AMENDED COMPLAINT

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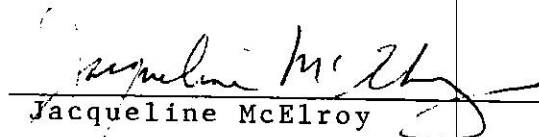
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Dated: Kew Gardens, New York
February 27, 2014

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From: Leslie Nizin <lnizin@aol.com>

To: Jackie Mcelroy <Jmcelroy123@aol.com>

Date: Wed, Feb 26, 2014 8:16 pm

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Pacer To File Login Id Lsnizin

From: Leslie Nizin <lnizin@aol.com>

To: Jackie Mcelroy <Jmcelroy123@aol.com>

Date: Wed, Feb 26, 2014 8:16 pm

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